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February 3, 2021

## VIA CM/ECF

The Honorable Edgardo Ramos United States District Judge United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: Dunbar v. Two Big Boys, Inc et al (19-cv-08321-ER)

Dear Judge Ramos:

In accordance with the Court's January 27<sup>th</sup> directive (entered January 29, 2021), the undersigned submits that, as of the date of this letter, although initial responses to *Plaintiff's First Request for Production to Defendant John Ioannou* have been provided, counsel was not able to provide responses to all discovery demands propounded by Plaintiff in accordance with the Court's *Order* dated January 19, 2021 [Doc. No. 36] and the *Civil Case Discovery Plan and Scheduling Order* entered November 18, 2020 [Doc. No. 25].

Respectfully,

Paris Gyparakis

PG/clm

cc: Ismail S. Sekendiz, Esq.